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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re	:	Chapter 11
	:	
DITECH HOLDING CORPORATION, <i>et al.</i> ,	:	Case No. 19-10412 (JLG)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
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**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR THE
CONFIRMATION HEARING COMMENCING ON AUGUST 7, 2019 AT 11:00 A.M.**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,
before the Honorable James L. Garrity, Jr., United States Bankruptcy
Judge, One Bowling Green, Courtroom 601, New York, New York
10004

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are Ditech Holding Corporation (0486); DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Mortgage Asset Systems, LLC (8148); REO Management Solutions, LLC (7787); Reverse Mortgage Solutions, Inc. (2274); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837). The Debtors' principal offices are located at 1100 Virginia Drive, Suite 100, Fort Washington, Pennsylvania 19034.

I. UNCONTESTED MATTER:

1. Motion of Debtors for (I) Authorization to Enter into DIP Amendment and Pay Related Fees Thereunder and (II) Granting Related Relief (**ECF No. 1073**)

Response Deadline: August 6, 2019 at 12:00 p.m.

Responses Filed: None.

Related Documents:

- A. Declaration of Jeffrey Lewis in Support of Motion (**ECF No. 1074**)
- B. Order Shortening Notice (**ECF No. 1071**)

Status: This matter is going forward.

II. CONTESTED MATTERS:

2. Second Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors (**ECF No. 1032**)

Response Deadline: July 30, 2019 at 4:00 p.m.

Resolved Responses to Plan:

- A. Objection of Texas Taxing Authorities to Plan (**ECF No. 541**)
- B. Response of Texas Taxing Jurisdictions to Motion (**ECF No. 624**)
- C. Objection of Texas Taxing Jurisdictions to Confirmation of the Amended Plan (**ECF No. 630**)
- D. Maricopa County Treasurer's Objection to Amended Plan and Sale of Property (**ECF No. 684**)
- E. Objection of Nationstar Mortgage LLC to the Amended Plan (**ECF No. 935**)
 - i. Declaration of Jeremy Meacham in Support of Nationstar Mortgage LLC's Objection to Amended Plan (**ECF No. 1067**)
- F. Objection of Nationstar Mortgage LLC to Sale of Assets Through the Amended Plan (**ECF No. 937**)
- G. Limited Objection and Reservation of Rights of National Founders LP with Respect to the Sale and Plan Confirmation (**ECF No. 984**)

Responses to Plan:

- H. Objection of Creditor Marsha Chambers to the Disclosure Statement and Plan (**ECF No. 264**)
 - i. Motion of Marsha Chambers to Approve Clarification of Schedule A and Objection to Wording of Schedule A (**ECF No. 518**)
 - ii. Motion to Clarify and Objection to Plan of Marsha Chambers (**ECF No. 628**)
- I. Objection of Darryl Keith Browder to the Plan and Sale (**ECF No. 738**)
- J. Objection to Auction of Creditors Artist Thornton and Elaine Thornton's Property (**ECF No. 817**)
- K. Limited Objection of Teresa Garcia-Kuhn to Confirmation of Ditech's Plan of Reorganization and Proposed Sale of Assets to the Extent they Seek to Impair Claims Challenging the Validity *Vel Non* of Ditech's Mortgages and Deeds of Trust (**ECF No. 892**)
- L. Objections of the Geary Class Action to the 363 Sale Transaction Between Debtor, Ditech Financial, LLC and New Residential Investment Corp. (**ECF No. 899**)
- M. Objections of the Geary Class Action to Confirmation of the Amended Plan (**ECF No. 905**)
- N. Objection of Bank of America, N.A. to the Plan, the Proposed Sales, and Related Matters (**ECF No. 941**)
 - i. Declaration of Timothy Kihm in Support of Objection of Bank of America, N.A. to the Plan, the Proposed Sales, and Related Matters (**ECF No. 1066**)
 - ii. Declaration of Andrew Dugandzic in Support of Objection of Bank of America, N.A. to the Plan, the Proposed Sales, and Related Matters (**ECF No. 1068**)
- O. Objection of The Bank of New York Mellon Trust Company, The Bank of New York Mellon, Deutsche Bank National Trust Company, and U.S. Bank National Associates to Proposed Cure Costs and Adequate Assurance (**ECF No. 944**)
 - i. Sur-Reply and Reservation of Rights of Certain Trustees to Statement in Support of the Debtors' (I) Memorandum of Law in Support of Confirmation of the Second Amended

Joint Chapter 11 Plan of Ditech Holding Corporation and
its Affiliated Debtors and (II) Omnibus Reply to Objections
Thereto **(ECF No. 1076)**

- P. Objection of Certain Consumer Creditors to Plan **(ECF No. 945)**
- Q. Objection of Launa L. Lishamer to Notice of Presentment and Amended Plan **(ECF No. 978)**
- R. Omnibus Objection of the Federal Home Loan Mortgage Corporation (Freddie Mac) **(ECF No. 983)**
- S. Joinder and Objection of the New York State Attorney General to Plan Confirmation **(ECF No. 986)**
- T. Objection and Reservation of Rights of the United States Trustee to the Plan **(ECF No. 987)**
- U. Objection to Property Auction of Creditors Artist and Elaine Thornton **(ECF No. 988)**
- V. Objection of the United States of America to Plan Confirmation **(ECF No. 998)**
- W. Objection of the Official Committee of Consumer Creditors to the Amended Plan and Sale of the Forward and Reverse Businesses **(ECF No. 943)**
 - i. Joinder of the Diamond Victims' in the Objection of the Official Committee of Consumer Creditors to the Amended Plan and Sale of the Forward and Reverse Businesses **(ECF No. 948)**
 - ii. Joinder of the Colorado Department of Law in Objection of the Official Committee of Consumer Creditors to the Amended Plan and Sale of the Forward and Reverse Businesses **(ECF No. 949)**
 - iii. Amended Joinder of Colorado Department of Law in Objection of the Official Committee of Consumer Creditors to the Amended Plan and Sale of the Forward and Reverse Businesses **(ECF No. 961)**
 - iv. Joinder of Consumer Creditors in Objection of the Official Committee of Consumer Creditors to Confirmation of the Proposed Plan of Reorganization **(ECF No. 969)**

- v. Joinder of Certain Consumer Creditors to the Objection of the Official Committee of Consumer Creditors to the Amended Plan (**ECF No. 976**)
- vi. Second Amended Joinder of the Colorado Department of Law to Objection to Plan and Sale (**ECF No. 1024**)
- vii. Sur-Reply of the Official Committee of Consumer Creditors in Connection with the Debtors' Amended Joint Chapter 11 Plan and Sale of the Debtors' Forward and Reverse Businesses (**ECF No. 1077**)

Adjourned Response to Plan:

- X. Objection and Reservation of Rights of International Fidelity Insurance Company and Allegheny Casualty Company to Confirmation of the Plan and Sale of Assets (**ECF No. 946**)²

Filings in Support of Confirmation:

- Y. Debtors' (I) Memorandum of Law in Support of Confirmation of Second Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors and (II) Omnibus Reply to Objections Thereto (**ECF No. 1029**)
 - i. Official Committee of Unsecured Creditors' Omnibus Reply in Support of Confirmation of the Amended Plan (**ECF No. 1026**)
 - ii. Joinder of Forward Buyer New Residential Investment Corp. in Further Support of Debtors' Reply to 363(o) Objections (**ECF No. 1027**)
 - iii. Statement of the Reverse Buyer in Support of Confirmation of the Second Amended Plan (**ECF No. 1031**)
 - iv. Term Loan Ad Hoc Group's Statement in Support of the Debtors' (I) Memorandum of Law in Support of Confirmation of the Second Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors and (II) Omnibus Reply to Objections Thereto (**ECF No. 1047**)
- Z. Declaration of Gerald A. Lombardo, Debtors' Chief Financial Officer, in Support of the Sale Transactions and Confirmation of the Amended Plan (**ECF No. 1033**)

² This objection has been adjourned with respect to all issues other than the Surety/Free and Clear Argument (as defined in the Proposed Confirmation Order) to a date to be announced.

- AA. Declaration of Reid Snellenbarger of Houlihan Lokey Capital, Inc., Debtors' Investment Banker, in Support of the Sale Transactions and Confirmation of the Amended Plan (**ECF No. 1034**)
- BB. Declaration of James Nelson of AlixPartners, LLP, Debtors' Financial Advisor, in Support of Global Settlement and Confirmation of the Amended Plan (**ECF No. 1035**)
- CC. Declaration of Sunny Singh in Support of the Sale Transactions and Confirmation of the Amended Plan (**ECF No. 1036**)
- DD. Declaration of Jane Sullivan of Epiq Corporate Restructuring, LLC Regarding Voting and Tabulation of Ballots Cast on the Second Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors (**ECF No. 1037**)
- EE. Supplemental Declaration of Jane Sullivan of Epiq Corporate Restructuring, LLC Regarding Voting and Tabulation of Ballots Cast on the Second Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors (**ECF No. TBD**)

Related Documents:

- FF. Amended Disclosure Statement for Amended Plan (**ECF No. 543**)
- GG. Order Approving Disclosure Statement (**ECF No. 544**)
- HH. Notice of Filing of Liquidation Analysis, Recovery Analysis, and Summary of Implied Value with Respect to the Amended Disclosure Statement for Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors (**ECF No. 833**)
- II. Notice of Filing of Plan Supplement in Connection with Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors (**ECF No. 844**)
- JJ. Notice of Extended Voting Deadline and Filing of Second Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors (**ECF No. 1032**)
- KK. Proposed Order Confirming Second Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors (**ECF No. 1038**)
- LL. Notice of Selection of Creditor Recovery Trustee (**ECF No. 1085**)

Status: This matter is going forward as to the Plan Confirmation Objections. All Adequate Assurance and Cure Objections are adjourned to a date(s) to be announced. See **Exhibit A** attached hereto.

3. Motion of Emad Sarhan for Relief from the Automatic Stay (**ECF No. 585**)

Response Deadline: July 30, 2019 at 4:00 p.m.

Response Filed:

- A. Debtors' Objection to Motion of Emad Sarham for Relief from the Automatic Stay (**ECF No. 1046**)

Related Documents:

- B. Notice of Adjournment (**ECF No. 629**)

Status: This matter has been continued to the Confirmation Hearing on August 7, 2019 at 11:00 a.m.

4. Mario and Queenie Brown's Emergency Motion for Orders Pursuant to 11 U.S.C. § 362(d) and (j), Modifying the Automatic Stay or Determining that the Automatic Stay Does Not Apply, So They May Assert Counterclaims in the Debtors' Action Against Them with Points and Authorities (**ECF No. 589**)

Response Deadline: July 30, 2019 at 4:00 p.m.

Responses Filed:

- A. Debtors' Objection to Motion of Mario and Queenie Brown (**ECF No. 1042**)
- B. Reply of Mario and Queenie Brown in Support of Motion (**ECF No. 1082**)

Related Documents:

- C. Order to Show Cause (**ECF No. 590**)
- D. Statement by the Official Committee of Consumer Creditors in Support of Relief from Stay Sought by Mario and Queenie Brown (**ECF No. 595**)
- E. Notice of Adjournment (**ECF No. 596**)
- F. Declaration of Chad J. Hammons, Esq. in Support of Debtors' Objection (**ECF No. 1043**)
- G. Declaration of Jeanetta M. Brown in Support of Debtors' Objection (**ECF No. 1044**)
- H. Declaration of Jeffrey Barber in Support of Debtors' Objection (**ECF No. 1045**)

Status: This matter has been continued to the Confirmation Hearing on August 7, 2019 at 11:00 a.m.

III. ADJOURNED MATTERS:

5. Motion for Leave to File Objection to Debtors' Notice of Presentment Regarding Proposed Settlement with Black Knight (**ECF No. 750**)

Response Deadline: July 18, 2019 at 4:00 p.m.

Responses Filed:

- A. Statement of the Official Committee of Unsecured Creditors (I) in Support of Notice of Presentment of Stipulation and Agreed Order Authorizing Debtors to Enter into Postpetition Agreement, and (II) Objection to the Motion for Leave to File Objection to Notice of Presentment (**ECF No. 816**)
- B. Debtors' Objection to Motion of Certain Consumer Creditors for Leave to File Objection to Notice of Presentment (**ECF No. 873**)

Related Document:

- C. Notice of Hearing (**ECF No. 975**)

Status: This matter has been adjourned to August 28, 2019 at 11:00 a.m.

6. Notice of Presentment of Stipulation and Agreed Order Authorizing Debtors to Enter into Postpetition Agreement (**ECF No. 682**)

Response Deadline: June 14, 2019 at 4:00 p.m.

Responses Filed: None.

Related Documents: None.

Status: This matter has been adjourned to August 28, 2019 at 11:00 a.m.

7. Motion of Ocwen Loan Servicing, LLC for Relief from the Automatic Stay (**ECF No. 567**)

Response Deadline: July 30, 2019 at 4:00 p.m.

Responses Filed: None.

Related Document:

- A. Proposed Consent Order Granting Limited Relief from Automatic Stay for Movant Ocwen Loan Servicing, LLC (**ECF No. 1040**)

Status: A proposed stipulation has been submitted to the Court. To the extent the Court does not enter the proposed stipulation, this matter will be adjourned to August 28, 2019 at 11:00 a.m.

Dated: August 6, 2019
New York, New York

/s/ Sunny Singh
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Exhibit A

Adjourned Responses to Adequate Assurance and Cure Amounts:

1. Objection of Safeguard Properties Management LLC to Proposed Cure Amounts **(ECF No. 857)**
2. Objection of ServiceLink NLS, LLC and Its Affiliates to Proposed Cure Amounts **(ECF No. 859)**
3. Objection of Safeguard to Proposed Assumption of Executory Contracts of Debtors (Wind Down Estates) **(ECF No. 871)**
4. Objection of Gross Polowy, LLC to Proposed Cure Amounts **(ECF No. 876)**
5. Objection of McCalla Raymer Leibert Pierce, LLC to Assumption and Assignment and Proposed Cure Amounts **(ECF No. 885)**
6. Objection of Ras Boriskin to Proposed Cure Amounts **(ECF No. 886)**
7. Objection of Ras Citron, LLC to Proposed Cure Amounts **(ECF No. 887)**
8. Objection of Ras Crane, LLC to Proposed Cure Amounts **(ECF No. 889)**
9. Objection of Robertson, Anschutz & Schneid, P.L. to Proposed Cure Amounts **(ECF No. 891)**
10. Objection of Orlans PC to and Proposed Cure Amounts and Adequate Assurance **(ECF No. 893)**
11. Objection of McCarthy & Holthus, LLP to Proposed Cure Amounts and Adequate Assurance **(ECF No. 895)**
12. Objection of Phelan Hallinan Diamond & Jones, LLP to Proposed Cure Amounts **(ECF No. 901)**
13. Limited Objection of the Federal Deposit Insurance Corporation to Cure Notices and Request for Additional Time to Respond **(ECF No. 902)**
14. Limited Objection and Reservation of Rights of Conduent Commercial Solutions, LLC to Proposed Cure Amounts and Assumption and Assignment (Forward Buyer) **(ECF No. 911)**
15. Objection of McCabe, Weisberg & Conway, LLC to Proposed Cure Amounts **(ECF No. 913)**
16. Limited Objection of Wilson & Associates to Proposed Cure Amounts and Assumption and Assignment **(ECF No. 914)**
17. Oracle's Limited Objection and Reservation of Rights Regarding: (1) Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors; (2) Notice of Cure Costs and Potential Assumption or Assumption and

Assignment of Executory Contracts and Unexpired Leases of Debtors; (3) Notice of Assumption or Rejection of Executory Contracts and Unexpired Leases of Debtors (Wind Down Estates); and (4) Notice of Assumption and Assignment of Executory Contracts and Unexpired Leases of Debtors (Forward Buyer) (**ECF No. 916**)

18. Objection of CyrusOne LLC to Proposed Cure Amounts (**ECF No. 918**)
19. Objection of Finance of America Reverse LLC to Proposed Cure Costs and Potential Assumption of Executory Contracts and Unexpired Leases (**ECF No. 920**)
20. Objection of Tiffany & Bosco, P.A. to Proposed Cure Amounts (**ECF No. 921**)
21. Objection of JPMorgan Chase Bank, N.A. to Proposed Assumption and Assignment of Tempe, AZ Lease in Connection with Forward Business Sale (**ECF No. 922**)
22. Objection of Heavner, Beyers & Mihlar, LLC to Proposed Cure Amounts (**ECF No. 924**)
23. Objection of Mackie Wolf Zientz & Mann, P.C. to Proposed Cure Amounts (**ECF No. 928**)
24. Limited Objection of Microsoft Corporation (**ECF No. 929**)
25. Objection and Reservation of Rights of Padgett Law Group to Proposed Cure Amounts (**ECF No. 930**)
26. Objection of Xome to Notice of Assumption and Assignment of Certain Executory Contracts and Related Cure Amounts (**ECF No. 931**)
27. Objection and Reservation of Rights of Korde & Associates, P.C. to Notice of Assumption and Assignment of Executory Contracts and Unexpired Leases of Debtors (Forward Buyer) (**ECF No. 932**)
28. Objection of Nationstar Mortgage, LLC to Notice of Assumption and Assignment of Certain Executory Contracts and Related Cure Amounts (**ECF No. 934**)
29. Objection of KML Law Group, P.C. to Proposed Cure Amounts and Adequate Assurance (**ECF No. 938**)
30. Objection of The Bank of New York Mellon Trust Company, The Bank of New York Mellon, Deutsche Bank National Trust Company, and U.S. Bank National Associates to Proposed Cure Costs and Adequate Assurance (**ECF No. 944**)
31. Objection of the TMLF Entities to Proposed Cure Amounts (**ECF No. 947**)

32. Limited Objection of Capital One, N.A. and GreenPoint Credit, LLC to Proposed Cure Amounts and Adequate Assurance (**ECF No. 950**)
33. Objection of SAP America, Inc. and Concur Technologies, Inc. to Assumption, or Assumption and Assignment, of Executory Contracts Pursuant to the Plan and Sale (**ECF No. 951**)
34. Objection of CenturyLink Communications, LLC to Proposed Cure Amount (**ECF No. 953**)
35. Objection of Noonan & Lieberman, LTD to Proposed Cure Amounts (**ECF No. 954**)
36. Objection of Hitachi Vantra Corporation to Proposed Cure Amount (**ECF No. 960**)
37. Objection of Ballard Spahr LLP to Proposed Cure Amounts (**ECF No. 962**)
38. Objection of Pro-Teck Services, Ltd. to Proposed Cure Amounts (**ECF No. 980**)
39. Motion of Aldridge Pite, LLP to Extend Deadlines to Respond to: (1) Notice of Cure Costs and Potential Assumption or Assumption and Assignment of Executory Contracts and Unexpired Leases of Debtors at Docket No. 824; (2) Notice of Assumption and Assignment of Executory Contracts and Unexpired Leases of Debtors (Reverse Buyer); and (3) Notice of Assumption and Assignment of Executory Contracts and Unexpired Leases of Debtors (Forward Buyer) (**ECF No. 1010**)
40. Limited Objection of Aldridge Pite, LLP to Proposed Cure Amounts (**ECF No. 1011**)
41. Ex Parte Motion of Aldridge Pite, LLC to Shorten Time to Hear Motion to Extend Deadlines (**ECF No. 1075**)
42. Limited Objection of Wilson & Associates, PLLC to Second Supplemental Notice of Cure Costs and Potential Assumption or Assignment of Executory Contracts and Unexpired Leases (**ECF No. 1084**)
43. Supplemental Objection of Safeguard Properties Management, LLC to Supplemental Cure Notice (**ECF No. 1090**)

Resolved Responses to Adequate Assurance and Cure Amounts:

44. Objection of SouthLaw, P.C. to Proposed Cure Amounts (**ECF No. 923**)
45. Objection of Reimer Law Co., f/k/a Reimer, Arnovitz, Chernenk & Jeffrey Co., L.P.A. to Proposed Cure Amounts (**ECF No. 926**)
46. Objection of Trott Law, P.C. to Proposed Cure Amounts (**ECF No. 933**)

- 47. Objection of Millsap & Singer LLC to Proposed Cure Amounts and Adequate Assurance (**ECF No. 940**)
- 48. Objection of Bendett & McHugh, P.C. to Proposed Cure Amounts and Adequate Assurance (**ECF No. 942**)

Related Adequate Assurance and Cure Notices:

- 49. Notice of Cure Costs and Potential Assumption or Assumption and Assignment of Executory Contracts and Unexpired Leases of Debtors (**ECF No. 824**)
- 50. Supplemental Notice of Cure Costs and Potential Assumption or Assumption and Assignment of Executory Contracts and Unexpired Leases of Debtors (**ECF No. 834**)
- 51. Notice of Assumption or Rejection of Executory Contracts and Unexpired Leases of Debtors (Wind Down Estates) (**ECF No. 837**)
- 52. Notice of Assumption and Assignment of Executory Contracts and Unexpired Leases of Debtors (Reverse Buyer) (**ECF No. 839**)
- 53. Notice of Assumption and Assignment of Executory Contracts and Unexpired Leases of Debtors (Forward Buyer) (**ECF No. 840**)
- 54. Supplemental Notice of Assumption and Assignment of Executory Contracts and Unexpired Leases of Debtors and Removal of Executory Contracts and Unexpired Leases from Initial Notice (Wind Down Estates) (**ECF No. 1012**)
- 55. Second Supplemental Notice of Cure Costs and Potential Assumption or Assumption and Assignment of Executory Contracts and Unexpired Leases of Debtors (**ECF No. 1013**)
- 56. Supplemental Notice of Assumption and Assignment of Executory Contracts and Unexpired Leases of Debtors and Removal of Executory Contracts and Unexpired Leases from Initial Notice (Forward Buyer) (**ECF No. 1014**)
- 57. Third Supplemental Notice of Cure Costs and Potential Assumption or Assumption and Assignment of Executory Contracts and Unexpired Leases of Debtors (**ECF No. 1087**)